



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

APR 27 2015

Patricia A. Grantham, Forest Supervisor  
Klamath National Forest HQ  
Attn: Wendy Coats, Environmental Coordinator  
1711 South Main Street  
Yreka, CA 96097

Subject: Draft Environmental Impact Statement for the Westside Fire Recovery Project, Klamath National Forest, California (CEQ# 20150062)

Dear Ms. Grantham:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Westside Fire Recovery Project, Klamath National Forest, California. Our review is provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA understands that the current conditions in the Klamath National Forest are extremely vulnerable to fire, largely due to fire suppression, climate change and past forest activities such as planting proximity and replanting species to further future timber harvest rather than a diverse sustainable forest environment. However, we understand that past forest activities of managing forest purely for outputs such as timber rather than sustainability are no longer the Forest Service practice. Specifically, the Forest Service plans to replant a variety of conifer species to ensure the natural strength that comes with diversity of species. We also understand that due to the intensity of the fires in the project area, little if any seed storage is available in the burned areas. Therefore, allowing the area to naturally re-vegetate is not a viable solution. The DEIS indicates that existing hardwoods will be retained/encouraged and that replanting of conifers will include spacing to safeguard epicormic sprouting areas such as growth that emerge from the trunks of burned trees.

The Proposed Action would initiate forest recovery and the salvage of dead trees across more than 162,300 acres of National Forest System land, and would include 650 miles of roadside hazard treatments. The project proposes to use a combination of ground-based, skyline, and helicopter logging systems to facilitate timber removal. EPA acknowledges that removal of dead trees is not without adverse environmental impacts. However, leaving the dead trees would essentially amount to providing a pile of charcoal next to remaining intact forest which, would potentially lead to additional destruction when future fires occur, further degrading the environment.

EPA supports the use of best management practices to effectively protect water quality. We understand that the Forest Service is working with the State Water Quality Resources Control Board to implement mitigation measures to reduce adverse impacts to watersheds in the project area such as sedimentation and temperature variation.

The EPA commends the Forest Service for limiting operations in areas containing species of concern. We recommend that the Final Environmental Impact Statement fully commit to protecting intact critical habitat for species of concern such as the northern spotted owl, coho salmon, eagles and pacific fisher. While salvage of dead trees could destroy some potential habitat, we understand that the Forest Service anticipates that the vast amount of remaining unlogged charred and/or dead trees will be enough to sustain the surviving wildlife species dependent on post-fire environments. We recommend that the FEIS include the results of consultation with the United States Fish and Wildlife Service and the National Oceanic and Atmospheric Administration if appropriate. We recommend that the FEIS include a closure and restoration plan for the proposed temporary roads and landings when the project is completed.

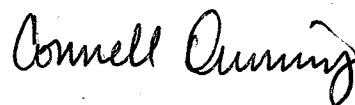
EPA appreciates that the Forest Service cites and uses recommendations in the 2014 Council on Environmental Quality Draft Greenhouse Gas guidance in the DEIS, and we believe it was helpful to include an estimate of greenhouse gas emissions. We also note that estimates of carbon storage were not provided, based on a conclusion that carbon storage "is not well quantified or thoroughly understood, especially at the project level." While a calculation of carbon storage may not be relevant in this particular fire recovery project, we recommend that the Final EIS provide additional information as to why carbon storage was not calculated, recognizing that the Forest Service has several tools and calculators that can estimate carbon storage. Finally, we also recommend that the FEIS include, in addition to estimates of average global temperature increases, estimates from the US Global Change Research Program for average temperature increases in the U.S.

The project area is culturally and spiritually important to Tribes and Tribal Consultation is an important component of the decision-making process associated with the project. We encourage the Forest Service to continue meaningful consultation throughout the NEPA process, with all potentially affected tribal governments. We recommend that the results of consultations with tribal governments and with the Tribal Historic Preservation Office/State Historic Preservation Office be included in the FEIS.

EPA has rated the DEIS and preferred alternative 2 as Lack of Objections—LO (see enclosed "Summary of Rating Definitions"). We support the best management practices and resource protection measures included in the project design. We recommend that the FEIS incorporate the additional measures and information specified above.

Thank you for the opportunity to review this DEIS. We also appreciate the Forest Service's coordination with us prior to and during our review, via phone calls and site visits. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,



Kathleen Martyn Goforth, Manager  
Environmental Review Section

Enclosure: Summary of the EPA Rating System

## **SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***“LO” (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***“EC” (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***“EO” (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***“EU” (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***Category “1” (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***Category “2” (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***Category “3” (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.